

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE UBIQUITI NETWORKS, INC.
SECURITIES LITIGATION

THIS DOCUMENT RELATES TO: ALL
CASES

Case No. 18-CV-01620 (VM)

CLASS ACTION

**LEAD PLAINTIFF’S UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Pursuant to Fed. R. Civ. P. 23(e), Lead Plaintiff Xiya Qian (“Lead Plaintiff”), individually and on behalf of all Settlement Class Members, hereby moves this Court for an order: (i) granting preliminary approval of the proposed Settlement; (ii) certifying the proposed Settlement Class; (iii) granting approval of the form and manner of giving notice of the proposed Settlement to the Settlement Class Members; (iv) setting a date for a Settlement Hearing and deadlines for the mailing of the Notice and publication of the Publication Notice, for Settlement Class Member objections and Settlement Class Member opt-out notices, for the filing of Lead Plaintiff’s motion for Final Approval of the Settlement, and for the filing of Lead Counsel’s application for an award of attorneys’ fees and reimbursement of expenses and a compensatory award to Lead Plaintiff.

This motion is based upon the accompanying Memorandum of Law and Stipulation of Settlement, with its Exhibits, and the Declaration of Jeremy A. Lieberman and the exhibits thereto that are filed contemporaneously herewith, and other such matters and argument as the Court may consider at the hearing on this motion.

Significantly, Defendants do not oppose the relief sought by this motion.

Dated: December 2, 2019

Respectfully submitted,

POMERANTZ LLP

*/s/ Jeremy A. Lieberman*_____
Jeremy A. Lieberman
Michael Grunfeld
600 Third Avenue, 20th Floor
New York, New York 10016
Telephone: (212) 661-1100
Facsimile: (917) 463-1044
jalieberman@pomlaw.com
mgrunfeld@pomlaw.com

Lead Counsel for Lead Plaintiff Xiya Qian and Class

**BRONSTEIN, GEWIRTZ
& GROSSMAN, LLC**

Peretz Bronstein
60 East 42nd Street, Suite 4600
New York, NY 10165
(212) 697-6484
peretz@bgandg.com

Additional Counsel

CERTIFICATE OF SERVICE

I hereby certify that on this, the 2nd day of December, 2019, a true and correct copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Jeremy A. Lieberman